REMARKS

Claims 1-40 have been amended. Claims 41-44 have been added. Claims 1-44 are pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejection:

The Examiner rejected claims 1, 6-10, 15-19, 21-23, 28-32, and 37-40 under 35 U.S.C. § 102(e) as being anticipated by Takaoka et al. (U.S. Publication 2003/0085914) (hereinafter "Takaoka"). Applicants respectfully traverse this rejection for at least the following reasons.

In regard to claim 1, Takaoka does not teach a *zone visualization mechanism configured to, in response to selection of a particular SAN object in the SAN, display one or more tables of zoning information for the selected SAN object, wherein the one or more tables of zoning information for the selected SAN object include one or more entries for each one of multiple zones of the SAN of which the selected SAN object is a member, wherein each of the one or more entries includes information describing a particular membership of the selected SAN object in the respective zone*, as is recited in amended claim 1. The Takaoka reference teaches a graph interface for rendering graphical representations of SAN components and their physical and logical interrelationships (*see, e.g.*, paragraph [0036], and paragraph [0102] cited by the Examiner). The Takaoka reference does **not** teach displaying one or more tables of zoning information for a selected SAN object, nor does the Takaoka reference teach displaying one or more tables of zoning information that include an entry for each of multiple zones of the SAN of which the selected SAN object is a member, nor does the Takaoka reference teach each of the one or more entries including information describing a particular membership of the selected SAN object in the respective zone. Nor do the other references cited by the Examiner in the § 103(a) rejections teach these limitations.

In further regard to claim 1, in the Action dated December 12, 2008, the Examiner cites paragraph [0102] of Takaoka, which reads (emphasis added):

> To generate a zone, the user generates an area on the screen 1000 and then moves in the area by a pointing device 25 a symbol of a storage device port and a symbol of a computer port to be added to a <u>new zone to be created</u>. To delete a zone, the user delete[s] an area corresponding to the zone by a menu operation.

In the above citation, Takaoka clearly does **not** teach the above limitations as recited in amended claim 1. In the citation, Takaoka describes that the user generates an "area on the screen" to represent <u>a zone</u>, and then selects objects (e.g., a symbol of a storage device and a symbol of a computer port) and <u>moves</u> the objects into the area representing the zone. These actions are performed in a process of adding the objects to a new zone to be created. The objects, when selected, are not actually in the zone on the SAN, as the zone has not yet been created. Claim 1 is in contrast directed at displaying one or more tables of zoning information in response to selecting a SAN object that include one or more entries for each of <u>multiple</u> zones of the SAN of which the selected SAN object <u>is a member</u> prior to and at the time of selection.

Furthermore, the Examiner asserts in regard to Takaoka "the SAN object is moved into a generated area (a zone) on the screen, thereby displaying the object is a member of the zone." In Takaoka, the area representing a zone is clearly displayed <u>prior to</u> the user selecting a SAN object. The user simply moves the object into the displayed area representing the zone. In contrast, in claim 1 of the instant application, zoning information for a selected SAN object, indicating multiple zones of the SAN of which the selected SAN object is a member, is displayed <u>in response to selection of the SAN object</u>. Claim 1 recites nothing like the user <u>moving</u> the SAN object into another area to "display the object is a member of the zone." In claim 1, simply <u>selecting</u> the SAN object causes <u>one or more tables of zoning information</u> including entries indicating <u>multiple zones</u> of the SAN of which the selected SAN object is a member to be displayed.

In the Action dated December 12, 2008, in response (B) to the above arguments, the Examiner asserts "the claim requires to display zoning information and Takaoka

displays zoning information when a SAN object is selected and moved into a zone area. The claim does not say a SAN object cannot be moved into an area to display the object as a member of the zone." Amended claim 1 recites displaying one or more tables of zoning information for a selected SAN object, where the one or more tables include one or more entries for each one of multiple zones of the SAN of which the selected SAN object is a member. Even if Takaoka does teach "display[ing] zoning information when a SAN object is selected and moved into a zone area", Takaoka clearly does not teach the limitations as recited in amended claim 1.

Thus, for at least the reasons presented above, the rejection of claim 1 is not supported by the cited prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 1 also apply to claims 10, 19, 23 and 32.

Section 103(a) Rejections:

The Examiner rejected claims 2, 4-5,11, 13-14, 20, 24, 26-27, 33, 35-36 under 35 U.S.C. § 103(a) as being unpatentable over Takaoka in view of Anslow et al. (U.S. Publication 2003/0130821) (hereinafter "Anslow"). Applicants respectfully traverse this rejection for at least the following reasons.

In regard to claim 2, the cited art does not teach or suggest *wherein the one or more tables of zoning information indicate logical zone membership for the selected SAN object, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone,* for at least the reasons given above in regard to claim 1. In addition, in the Action dated December 12, 2007, the Examiner cites Takaoka, paragraph [0066], which reads:

> Lines 1051 to 1054 respectively indicate paths set between the ports 35a and 35b of the storage device 3 and the logical units 33a to 33d. Lines 1051 and 1052 respectively indicate that the logical units 33a and 33b can be accessed from the port 35a. Lines 1053 and 1054 respectively indicate that the logical units 33c and 33d can be accessed from the port 35b..

Takaoka, in this selection is describing "logical units" (LUNs) in respect to SANs, and describes that "lines" can be drawn to indicate access paths between particular LUNS and ports in a SAN. This selection, like paragraph [0112] previously cited by the Examiner in regard to claim 2, is not describing and has nothing to do with the notion of logical zone membership of SAN objects, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone, as is recited in claim 2.

In the Action dated December 12, 2007, the Examiner asserts "Nonetheless, these features are well known in the art and would have been an obvious modification of the system disclosed by Takaoka, as evidenced by Anslow," and cites Anslow, Abstract and paragraphs [0035]-[0036]. If, by "these features", the Examiner is referring to the notion of logical zone membership, Applicants admit that the notion of logical zone membership is known in the art, as indicated in the Background section of the instant application. However, Applicants strongly disagree that "these features…would have been an obvious modification of the system disclosed by Takaoka." A purpose of the claimed invention is to overcome certain shortcomings of the prior art, shortcomings that are present in both Takaoka and Anslow.

Anslow discloses a method, system, and program for rendering a visualization of network devices in a computer user interface (Abstract). Anslow discloses, in the Figures and in the specification, various user interfaces that render various visualizations of network devices. In the citations provided by the Examiner and elsewhere, Anslow refers to logical relationships (although Applicants note that Anslow never specifically describes the notion of logical zone membership as recited in claim 2). However, Anslow, like Takaoka, does not teach or suggest all of the limitations as recited in amended claims 1 and 2 of the instant application. The cited art, alone or in combination, does not teach claim 2 when viewed as a whole.

Moreover, combining the references, if possible would not produce anything like what is recited in claim 2. There is no teaching in the references that, if combined, would produce what is recited in claim 2 when viewed as a whole.

Thus, for at least the reasons presented above, the rejection of claim 2 is not supported by the cited prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 2 also apply to claims 11, 20, 24 and 33.

In regard to claim 4, the cited art does not teach or suggest *wherein, for each zone of the SAN of which the selected SAN object is a member, the one or more tables of zoning information include a separate entry corresponding to each other SAN object through which the selected SAN object is a logical or physical member of the zone, wherein a SAN object is a logical member of a zone via relationship of the SAN object to other SAN objects that are physical members of the zone*, as recited in amended claim 4. The cited art, alone or in combination, do not teach all of the limitations as recited in amended claim 4.

Thus, for at least the reasons presented above, the rejection of claim 4 is not supported by the cited prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 4 also apply to claims 13, 26, and 35.

The Examiner rejected claims 3, 12, 25 and 34 under 35 U.S.C. § 103(a) as being unpatentable over Takaoka as applied to claims 1, 10, 19, 23 and 32, and further in view of Bramhall et al. (U.S. Publication 2003/0195956). Since the rejections have been shown to be unsupported for the independent claims, a further discussion of these rejections is not necessary at this time.

In regard to the Section § 102(e) and the Section § 103(a) rejections, Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejections have been shown to be unsupported for the

independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-15500/RCK.

Respectfully submitted,

/Robert C. Kowert/
Robert C. Kowert, Reg. #39,255
Attorney for Applicants

Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C.
P.O. Box 398
Austin, TX 78767-0398
Phone: (512) 853-8850

Date: February 20, 2008